

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

CIVIL NO. 12-2039 (GAG)

Plaintiffs,

v.

COMMONWEALTH OF PUERTO RICO,  
et. al.

Defendants.

**MOTION FOR LEAVE TO FILE PRPD'S FIRST BI-ANNUAL STATUS REPORT FOR  
THE YEAR 2017 IN COMPLIANCE WITH REQUIREMENT 261 OF THE AGREEMENT**

**TO THE HONORABLE COURT:**

**COME NOW** the COMMONWEALTH OF PUERTO RICO and the PUERTO RICO POLICE DEPARTMENT, through the undersigned counsel, and respectfully allege and pray as follows.

1. In accordance with Paragraph 261 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department, PRPD submitted a sealed version of its First Bi-Annual Status Report for the Year 2017 on May 25, 2017 to the Court, the Technical Compliance Advisor and counsel for the Department of Justice.
2. PRPD respectfully requests leave to file its First Bi-Annual Status Report for the Year 2017 unsealed.

**WHEREFORE**, PRPD respectfully requests that this Court grants leave to file First Bi-Annual Status Report for the Year 2017 unsealed.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on August 8<sup>th</sup>, 2017.

**WANDA VÁZQUEZ GARCED**  
Secretary of Justice

**WANDYMAR BURGOS VARGAS**  
Deputy Secretary in Charge of  
Litigation  
Department of Justice

**SUSANA PEÑAGARÍCANO BROWN**  
Director of Federal Litigation  
and Bankruptcy Division

**S/JOEL TORRES ORTIZ**  
**Joel Torres Ortiz**  
U.S.D.C. NO. 302311  
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